

**EXHIBIT 4**

**Deposition of passenger witness Christopher Campbell**

CHRISTOPHER CAMPBELL Volume 1

November 11, 2019

Page 1

1                   UNITED STATES DISTRICT COURT  
2                   DISTRICT OF NEVADA

3                   Case No.: 2:19-cv-01322-KJD-NJK

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4                   )  
5   PETER DELVECCHIA, individually and as   )  
next friend of A.D., a Minor,                  )  
6                   Plaintiffs,                      )  
7                   )  
8                   V.                                 )  
9                   FRONTIER AIRLINES, INC. and   )  
JOHN DOES 1 through 5, inclusive,            )  
9                   Defendants,                      )  
10    )

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11                   Videotaped Deposition of CHRISTOPHER CAMPBELL

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12                   Held at the Offices of  
13                   Overby Court Reporting Service  
14                   Greenville, North Carolina

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15                   Monday, November 11, 2019

16                   10:01 A.M.

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17                   Volume 1

18                   Pages 1 through 28

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23  
24  
25

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	Page 2		Page 4
1	A P P E A R A N C E S		
2	For the Plaintiff DelVecchia:		10:01 A.M.
3	John D. McKay, Esquire		Videographer: Going on the record at 10:01
4	Park Avenue Law LLC		
5	127 West Fairbanks Avenue, Suite 519		A.M., today's date is November 11th, 2019. This begins
6	Winter Park, Florida 32789		the video deposition of Christopher Campbell in the
7	(800) 391-3654		matter of Peter DelVecchia, et al, versus Frontier
8	johndmckayatty@gmail.com		Airlines, Incorporated, et al. This is filed in the
9			United States District Court in the District of Nevada;
10	For the Defendant Frontier Airlines, Inc.:		if counsel will please identify yourselves for the
11	Tara Shelke, Esquire		record and then our court reporter will swear in our
12	Adler Murphy & McQuillen, LLP		witness.
13	20 South Clark Street, Suite 2500		11 Mr. McKay: John McKay for the plaintiffs.
14	Chicago, Illinois 60603		12 Ms. Shelke: Tara Shelke on behalf of
15	(312) 345-0700		13 defendant, Frontier Airlines.
16	tshelke@amm-law.com		14 (Whereupon,
17			15 Christopher Campbell
18	Also present:		16 was called as a witness, duly sworn, and testified as
19	Trae Howerton, Videographer		17 follows:)
20			18 D I R E C T E X A M I N A T I O N 10:02 A.M.
21			19 By Ms. Shelke:
22			20 Q Would you state your full name, please?
23			21 A Christopher James Campbell.
24			22 Q Let the record reflect that this is the
25			23 deposition of Christopher James Campbell taken pursuant
			24 to subpoena and set for today's date by agreement of
			25 the parties. This deposition shall be conducted in
	Page 3		Page 5
1	T A B L E O F C O N T E N T S		
2	Witness	Direct	accordance with the Federal Rules of Civil Procedure
3	Christopher Campbell	Cross	and all applicable rules of the United States District
4	by Ms. Shelke:	Redirect	Court for the District of Nevada. Mr. Campbell, my
5	4-25	Recross	name is Tara Shelke. I represent defendant Frontier
6	by Mr. McKay:	25-27	Airlines in a lawsuit filed by Peter DelVecchia and his
7			son, who's referred to as A.D. in this litigation. I'm
8			going to be asking you some questions today about
9			Frontier Flight 2067 from Raleigh to Las Vegas on March
10			28th of 2019. You were a passenger on that flight,
11	E X H I B I T S		10 correct?
12	Number	Description	11 A I was.
13	Exhibit 1	Photograph	12 Q And have you ever given a deposition before?
14			13 A I have not.
15			14 Q Okay, well, a few things to keep in mind
16			15 today, the first is that we do have a court reporter
17			16 with us today and she's recording everything that's
18			17 being said. For sake of clarity, if you will wait for
19			18 me to finish my question before you answer and then
20			19 I'll do the same for you, we'll get a clean transcript,
21			20 okay?
22			21 A I understand.
23			22 Q Second of all, if your answers, as you're
24			23 doing right now must be verbal, yes, no, I don't know
25			24 is okay as well, but if you only nod or shrug, the
			25 court reporter can't take that down.

	Page 6		Page 8
1	A Got it.	1	Q Are you currently employed?
2	Q If you -- if I ask you a question and you do	2	A No.
3	not understand it, please let me know and I can ask it	3	Q Are you currently in school?
4	differently or rephrase it, but if I ask you a question	4	A No.
5	and you answer the question, I'm going to assume that	5	Q Are you currently in the military?
6	you understood the question, fair?	6	A No.
7	A That is.	7	Q Have you ever worked in the airline industry?
8	Q And then finally, if you need to take a break	8	A I have not.
9	at any time, just let us know. I only ask that if	9	Q Do you have any medical training?
10	there is a question pending, you answer the question	10	A No.
11	before we take a break.	11	Q Do you recall why you were traveling to Las
12	A Sure.	12	Vegas on March 28, 2019?
13	Q Mr. John McKay here represents the plaintiffs	13	A Yes.
14	in this lawsuit. Have you ever spoken with Mr. McKay?	14	Q What were you going to do?
15	A No.	15	A Partially, I -- I play poker, so that's what
16	Q Have you ever spoken to anybody who's told	16	I was going to do.
17	you they're from Mr. McKay's office?	17	Q Were you going to play for a particular
18	A No.	18	tournament or just generally to play?
19	Q What is your date of birth?	19	A I had been up there back and forth quite a
20	A [REDACTED] 1983.	20	bit over the past year or so and before that as well,
21	Q Are you married?	21	so I was not unfamiliar to, you know, the Las Vegas
22	A No.	22	area.
23	Q Divorced?	23	Q Okay, on March 28th of 2019, were you
24	A No.	24	traveling alone?
25	Q Do you have any children?	25	A Yes.
	Page 7		Page 9
1	A No.	1	Q Do you recall that you were seated in an
2	Q What is your current address?	2	aisle seat?
3	A 212 Fairview Lane, Chocowinity, North	3	A Yes, that's my -- what I usually pay to do.
4	Carolina 27817.	4	Q Okay, you were awake for the entire flight,
5	Q And who lives at that address with you?	5	is that correct?
6	A My mother and stepfather.	6	A I was awake, yes.
7	Q Did you graduate from high school?	7	Q Now when all the passengers were seated and
8	A Yes.	8	the plane was ready for take off, do you recall that
9	Q Where did you attend high school?	9	there were two passengers next to you, one in the
10	A Robinson High School, which is in Fairfax,	10	middle seat and one in the aisle --
11	Virginia.	11	Mr. McKay: Object to the form.
12	Q And what year did you graduate high school?	12	Ms. Shelke: One in -- sorry; if I could
13	A 2001.	13	finish my question.
14	Q Did you go on to college after that?	14	Mr. McKay: Sorry.
15	A Yes.	15	By Ms. Shelke:
16	Q What is your highest level of education?	16	Q When passengers were seated and the plane was
17	A Some college.	17	ready for take off, do you recall that there were two
18	Q Where did you attend college?	18	passengers seated next to you, one on the middle seat
19	A Northern Virginia Community College.	19	and one in the window seat?
20	Q And that would have been the years 2001,	20	Mr. McKay: Objection to form.
21	2002?	21	The Witness: I do.
22	A More like 2002 to 2004; I was working as	22	By Ms. Shelke:
23	well, so.	23	Q Mr. Peter DelVecchia is here today. Do you
24	Q Okay, any other education?	24	recognize him as one of the passengers who was seated
25	A No.	25	next to you on Flight 2067?

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<p style="text-align: right;">Page 10</p> <p>1 A I don't recognize him specifically as that      2 guy, but I can say I remember sitting next to a older      3 white male that looks like him and a younger black male      4 and I believe the original configuration was me in the      5 aisle, the older gentleman in the middle and the      6 younger boy in the window seat. I believe that was the      7 configuration when we took off.</p> <p>8 Q Okay, I'm going to show you what we'll mark      9 as deposition Exhibit Number 1.</p> <p>10 (Exhibit Number 1 marked for identification.)</p> <p>11 Mr. McKay: Has this been produced?</p> <p>12 Ms. Shelke: I'm not sure. If it hasn't,      13 we'll supplement with this one.</p> <p>14 Mr. McKay: What's it from?</p> <p>15 Ms. Shelke: It's from the internet.</p> <p>16 By Ms. Shelke:</p> <p>17 Q I'm showing you what we've marked as      18 deposition Exhibit Number 1. It's a photograph of two      19 individuals. Do you recognize either of these      20 individuals as the person sitting on flight 2067, next      21 to you?</p> <p>22 A As I said, that matches the description that      23 I gave you, so I don't recognize them like, you know,      24 it was awhile ago and, you know, so I don't want to say      25 yes because it's not accurate but, you know, and I know</p>	<p style="text-align: right;">Page 12</p> <p>1 they're not noise cancelling.</p> <p>2 Q From the time that you boarded the aircraft      3 until the plane took off, did you understand that the      4 two passengers seated next to you were traveling      5 together?</p> <p>6 A Yes; am I allowed to elaborate on that?</p> <p>7 Q Yes.</p> <p>8 A I do remember at some point in the beginning,      9 when, you know, I wasn't listening to something      10 already, I do recall overhearing a phone call between      11 -- would be Mr. DelVecchia and another party saying      12 something along the lines of, we're on the plane; we're      13 going or, you know, something like -- that's what it      14 sounded like, just as a general sense.</p> <p>15 Q Okay, and from that you inferred, when he      16 said we, that the passenger next to him was traveling      17 with him?</p> <p>18 A Correct.</p> <p>19 Mr. McKay: Objection to the form.</p> <p>20 By Ms. Shelke:</p> <p>21 Q In that initial phase of the flight, from      22 when you boarded until when the plane took off, did you      23 ever learn the relationship between Peter and A.D.?</p> <p>24 A After -- later on, you know, A.D. was then      25 referred to as my son after -- after whatever happened</p>
<p style="text-align: right;">Page 11</p> <p>1 because of what it takes to fly on a plane in the      2 United States that -- sorry, I --</p> <p>3 Q No, that's a fair answer; thank you.</p> <p>4 Mr. McKay: Motion to strike as      5 nonresponsive.</p> <p>6 By Ms. Shelke:</p> <p>7 Q If I refer to the passenger who was seated in      8 the window seat as either the minor or A.D., will you      9 understand him to be the young African-American child      10 that you described earlier?</p> <p>11 A Yes.</p> <p>12 Mr. McKay: Objection to form.</p> <p>13 By Ms. Shelke:</p> <p>14 Q I'm going to break the flight up into      15 segments just so we can get some clarity. From the      16 time that you first boarded the aircraft until the      17 plane took off, did you speak with either passenger      18 seated next to you in your row?</p> <p>19 A Not to my recollection; I tend to wear ear      20 buds when I'm flying, since I've flown quite a bit over      21 the past couple years. The announcements are usually      22 the same as well, so.</p> <p>23 Q Are they noise cancelling headphones or are      24 you listening to music or something?</p> <p>25 A No, just music or, you know, other media but</p>	<p style="text-align: right;">Page 13</p> <p>1 happened so, you know, that became apparent.</p> <p>2 Q Okay, so later on in the course of the      3 flight, you learned that A.D. was Peter's son?</p> <p>4 Mr. McKay: Objection to the form.</p> <p>5 The Witness: To confirm it, sure; I mean      6 that's what I appeared to be in the --</p> <p>7 Ms. Shelke: Okay.</p> <p>8 The Witness: -- from the onset.</p> <p>9 By Ms. Shelke:</p> <p>10 Q Did you -- from the time that the -- you      11 boarded the aircraft until the plane took off, did you      12 overhear any conversations between Peter and A.D.?</p> <p>13 A Not that I remember.</p> <p>14 Q From the time that you boarded the aircraft      15 until the plane took off, did you see Peter and A.D.      16 interact in any way?</p> <p>17 A Not -- not that I remember; I'd say A.D. had      18 a tablet, I believe. That's about all I remember.</p> <p>19 Q Okay, now after the flight took off until      20 beverage service, did either passenger seated next to      21 you fall asleep?</p> <p>22 A That I can't answer. I will say I watched a      23 movie for pretty much the entire flight.</p> <p>24 Q I'm sorry. You were watching a movie,      25 correct?</p>

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<p style="text-align: right;">Page 14</p> <p>1 A I was watching a movie, so my attention was 2 pretty, you know, in front of me and, you know, I 3 wasn't hearing anything either, so.</p> <p>4 Q Okay, from the time that you boarded the 5 aircraft until drinks were served, did you ever see 6 Peter touch A.D.'s face?</p> <p>7 A No.</p> <p>8 Mr. McKay: Objection to the form.</p> <p>9 By Ms. Shelke:</p> <p>10 Q From the time that you boarded the aircraft 11 until drinks were served, did you ever see Peter touch 12 A.D.'s leg or thigh?</p> <p>13 Mr. McKay: Objection to the form.</p> <p>14 The Witness: No.</p> <p>15 By Ms. Shelke:</p> <p>16 Q At any time during this flight, did you see a 17 flight attendant hit Peter?</p> <p>18 Mr. McKay: Objection to the form.</p> <p>19 The Witness: I did not witness that, but a 20 flight attendant did kind of bump into me rather 21 aggressively, and like I said, I was watching a movie. 22 I really was not paying attention and I really wondered 23 what -- what -- why that was necessary and I kind of 24 just chalked it up to Frontier being Frontier.</p> <p>25 By Ms. Shelke:</p>	<p style="text-align: right;">Page 16</p> <p>1 Q So -- so if I understand correctly, you had 2 your headphones and you're watching a movie. A flight 3 attendant bumps into you aggressively. What is he 4 trying to do, at this point, the flight attendant, if 5 you know?</p> <p>6 A That's kind of a good question. I don't 7 know. There's not a good -- that rare reason to -- to 8 reach over in that manner towards, you know, it's not 9 like he was retrieving an empty drink or something like 10 that. So I -- I don't know --</p> <p>11 Q Okay.</p> <p>12 A -- but -- but I definitely took note that it 13 was not quite in the normal. That's not normally what 14 happens on -- on planes with a flight attendant.</p> <p>15 Q Did the flight attendant reach in front of 16 you or did he reach behind you, if you recall?</p> <p>17 A I think I was kind of -- and you see I'm 18 looking down like this and then he kind of came over 19 and kind of like -- I remember kind of being like 20 pushed to the back sort of like and then I was kind of 21 like, you know, what's going on after that so.</p> <p>22 Q Okay, so he came sort of from the back and 23 pushed you forward?</p> <p>24 A Yeah, because I was already kind of leaning 25 over, so yeah; it wasn't like in my lap or anything</p>
<p style="text-align: right;">Page 15</p> <p>1 Q Did -- was the flight attendant going from 2 the back of the aircraft to the front or from the front 3 of the aircraft to the back when he bumped into you 4 aggressively?</p> <p>5 A No, he was leaning over me in the -- in the 6 aisle seat.</p> <p>7 Q Okay, and when the flight attendant bumped 8 into, as he was leaning over you standing in the -- 9 when he was standing over you, did he still have the 10 beverage cart with him?</p> <p>11 A I don't think so. I believe when that 12 happened, he was on a specific mission to come to our 13 seats to move A.D., because I believe that's what 14 happened after -- after that.</p> <p>15 Q Okay, so if you'll tell me what happened from 16 when the flight attendant bumps into you?</p> <p>17 A All I remember is being kind of ticked off 18 about that and then suddenly, you know, I had to let 19 them out so A.D. moved to the back of the plane, I 20 guess, with the flight attendant and then Mr. Velchi -- 21 DelVecchia was there in the window seat afterwards kind 22 of wondering what -- what the heck was going on as was 23 -- as was I, because like I said, I didn't hear 24 anything or see anything lead -- leading up to this, so 25 it seemed rather unprompted.</p>	<p style="text-align: right;">Page 17</p> <p>1 like that, no.</p> <p>2 Q Okay.</p> <p>3 A It was more --</p> <p>4 Q Did you see where the flight attendant's 5 hands or arms landed after he pushed passed you?</p> <p>6 A That I did not, no.</p> <p>7 Q Okay, did you see anything during this flight 8 that you would describe as a flight attendant punching 9 Peter?</p> <p>10 Mr. McKay: Objection to the form.</p> <p>11 The Witness: That -- that I -- I would say 12 no.</p> <p>13 By Ms. Shelke:</p> <p>14 Q Okay, so you talked about A.D. being moved to 15 the back of the aircraft. What did the flight 16 attendant say to get A.D. to go with him?</p> <p>17 A I don't think I overheard that because I was 18 -- I don't think I paused what I was listening to or 19 anything like that. So I would say I don't know.</p> <p>20 Q Did you have to get out of your seat to allow 21 A.D. to come out into the aisle?</p> <p>22 A Yes.</p> <p>23 Q Did Peter also have to exit his seat and come 24 into the aisle to allow A.D. to go out?</p> <p>25 A I think so.</p>

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<p style="text-align: right;">Page 18</p> <p>1 Q After A.D. was taken from his seat, did Peter 2 follow A.D. out?</p> <p>3 A That I can't say. I don't think so, because 4 I can say afterwards, I remember him remarking out 5 loud, where'd my son go basically and --</p> <p>6 Q You talked about Peter in the window seat. 7 Was that immediately after A.D. left his seat and the 8 window seat was available or was it later in the 9 flight?</p> <p>10 A As best --</p> <p>11 Mr. McKay: Object to the form; sorry.</p> <p>12 The Witness: As best as I remember.</p> <p>13 By Ms. Shelke:</p> <p>14 Q It was immediately?</p> <p>15 A Yeah, yeah, we -- strangers don't normally 16 sit next to each other when there's an empty seat 17 available, so.</p> <p>18 Q Okay, after this incident with the flight 19 attendant occurred where he bumped into you, did Peter 20 appear injured to you?</p> <p>21 A Nothing that I remember particularly.</p> <p>22 Q So to the best of your recollection, he did 23 not appear to have any scratches, bruises, bleeding, 24 other marks on his face or head?</p> <p>25 Mr. McKay: Objection to the form.</p>	<p style="text-align: right;">Page 20</p> <p>1 Mr. McKay: Objection to the form.</p> <p>2 The Witness: I don't remember, so I don't 3 know. It's possible.</p> <p>4 By Ms. Shelke:</p> <p>5 Q After A.D. was taken out of his window seat, 6 did Peter remain seated in the window seat for the 7 duration of the flight, to the best of your knowledge?</p> <p>8 Mr. McKay: Objection to the form.</p> <p>9 The Witness: As I said, I don't know. I 10 wasn't -- you know, I was sitting in the aisle seat. 11 If somebody needs to get out, I let them out. I don't 12 really think twice about it, so.</p> <p>13 By Ms. Shelke:</p> <p>14 Q Okay, after A.D. was taken from his window 15 seat, do you know if Peter fell asleep?</p> <p>16 A I don't know.</p> <p>17 Q After A.D. was taken from his window seat, do 18 you have any recollection as to how Peter seemed in 19 terms of behavior or demeanor?</p> <p>20 Mr. McKay: Objection to the form.</p> <p>21 The Witness: As I stated before, the one 22 thing I do remember is him, you know, kind of remarking 23 out loud to everyone around like, do you know where my 24 son is? What happened, basically?</p> <p>25 By Ms. Shelke:</p>
<p style="text-align: right;">Page 19</p> <p>1 The Witness: I can say I don't remember any 2 first aid being rendered afterwards.</p> <p>3 By Ms. Shelke:</p> <p>4 Q When A.D. was taken from his window seat, do 5 you know where he was taken?</p> <p>6 A I mean it's a plane, so there's not that many 7 places, but I didn't know. I -- you know, it's not 8 something I was involved with, so.</p> <p>9 Q After A.D. was taken from his window seat, 10 did you ever go to the lavatory in the back of the 11 aircraft?</p> <p>12 A I don't remember. I mean -- like I said, I 13 fly pretty often, so I try to not do that, but I may 14 have gone. I -- I really don't remember. That's all I 15 can say.</p> <p>16 Q Okay, so fair to say that even if you had 17 gone to the back of the aircraft to use the lavatory, 18 you have no memory of seeing A.D. seated back there, 19 correct?</p> <p>20 A Correct.</p> <p>21 Q Did any of the flight attendants speak with 22 you about either Peter or A.D. during that flight?</p> <p>23 A Not at all.</p> <p>24 Q After A.D. was taken from his window seat, 25 did Peter ask to go out of his seat into the aisle?</p>	<p style="text-align: right;">Page 21</p> <p>1 Q Did anybody answer him?</p> <p>2 A As best as I remember, everyone else was kind 3 of like flight -- something -- the flight attendant, 4 you know; ask the flight attendant, basically.</p> <p>5 Q After A.D. was taken from his window seat, 6 did any of the flight attendants come to your row to 7 speak with Peter?</p> <p>8 A Not that I remember.</p> <p>9 Q When the aircraft landed in Las Vegas, were 10 any announcements made asking passengers to remain 11 seated even after the aircraft arrived at the gate?</p> <p>12 A Not that I remember; I would say the only 13 unusual thing I noticed upon arrival was law 14 enforcement waiting on the ramp, you know, outside the 15 doors to the aircraft.</p> <p>16 Q When you say law enforcement, do you happen 17 to know if they were FBI or Las Vegas Police?</p> <p>18 A I remember at least -- I mean there was 19 definitely more than a couple and some of them had tan 20 -- the tan Las Vegas, you know, Metro uniform or the 21 Sheriff uniforms on, so.</p> <p>22 Q When you were exiting the aircraft, do you 23 know if you would have exited before or after Peter?</p> <p>24 A Before.</p> <p>25 Q Do you know if Peter would have exited</p>

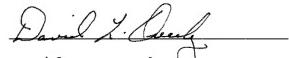
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<p style="text-align: right;">Page 22</p> <p>1   <b>directly behind you?</b></p> <p>2   A   That I can't say because, you know, looking 3   forward, I really wouldn't be looking behind me. I was 4   just looking to exit the aircraft.</p> <p>5   Q   <b>You mentioned that you saw law enforcement on 6   the jet bridge as you exited the aircraft. Did law 7   enforcement ask to speak with you?</b></p> <p>8   A   No.</p> <p>9   Q   <b>Did any of the flight attendants identify you 10   to the law enforcement personnel who were waiting on 11   the jet bridge?</b></p> <p>12   A   Not to the best of my knowledge; I mean no, 13   no, you know, none of them gave me a second look. 14   Nobody said anything to me. I only saw news articles 15   about this later on and I was like, oh, wait; I was 16   sitting next to this.</p> <p>17   Q   <b>And you said that you don't know if Peter was 18   directly behind you, so you would not have overheard 19   any conversations between the flight crew and Peter as 20   he was exiting the aircraft, correct?</b></p> <p>21   A   That's correct.</p> <p>22   Q   <b>While you stayed in Las Vegas for this trip, 23   were you ever contacted by either Las Vegas Metro 24   Police or the FBI?</b></p> <p>25   A   No.</p>	<p style="text-align: right;">Page 24</p> <p>1   <b>Was there anything in those articles that 2   surprised you?</b></p> <p>3   A   Well, yeah, the first article I saw kind of 4   alleged some rather criminal behavior. I was kind of 5   like ah, that doesn't -- and then the second time kind 6   of was more like Frontier being the -- the bad guy, so 7   that seemed more in line with -- with a -- and then I 8   know, you know, once I was contacted by the law forums, 9   then I kind of understood what was going on.</p> <p>10   Q   <b>And then for the record, you never saw any of 11   the criminal behavior that was alleged in the news 12   paper articles that you read, correct?</b></p> <p>13   A   No, nothing -- nothing like that.</p> <p>14   Q   <b>Do you know if more than one flight attendant 15   was involved in any of these incidents with Peter or 16   his son?</b></p> <p>17   A   No; I can just give you the description of 18   the one flight attendant. I do remember having that 19   interaction that I previously mentioned, kind of a 20   middle aged, younger, middle aged black male, you know, 21   probably, I don't know, 5'10", regular build. I think 22   he had a -- like a goatee but that might not be 23   accurate.</p> <p>24   Q   <b>Do you happen to recall this flight 25   attendant's name?</b></p>
<p style="text-align: right;">Page 23</p> <p>1   Q   <b>Since this incident, at any time, have you 2   been contacted by either Las Vegas Metro Police or the 3   FBI?</b></p> <p>4   A   No.</p> <p>5   Q   <b>Since March 28, 2019, which was the date of 6   this flight, have you spoken with either Peter or A.D.?</b></p> <p>7   A   No.</p> <p>8   Q   <b>You mentioned some news articles that you saw 9   about this incident. Do you recall what media they 10   were in?</b></p> <p>11   A   It was -- it was just part of Google News, 12   like I have Las Vegas' or my news on there. I don't 13   remember which outlet specifically it came up on, but I 14   think maybe I've seen it two separate times.</p> <p>15   Q   <b>And that would be two separate articles, was 16   that correct?</b></p> <p>17   A   That's correct.</p> <p>18   Q   <b>Do you know if the articles would have been 19   on the same day or different days?</b></p> <p>20   A   Different days.</p> <p>21   Q   Okay, and there was enough information in 22   those articles for you to recall that it pertained to 23   this flight 2067 from Las Vegas to -- or sorry, Raleigh 24   to Las Vegas on March 28, 2019?</p> <p>25   A   Yes.</p>	<p style="text-align: right;">Page 25</p> <p>1   A   No.</p> <p>2   Q   <b>Was there anything about the interaction 3   between this flight attendant and Mr. DelVecchia or 4   A.D. that you believed was motivated by race?</b></p> <p>5   Mr. McKay:   Objection to the form.</p> <p>6   The Witness:   No.</p> <p>7   Ms. Shelke:   That's all the questions I 8   have, but Mr. McKay may have some questions.</p> <p>9   The Witness:   Sure.</p> <p>10   Mr. McKay:   I'm going to ask to take a 11   short break to determine whether we have any.</p> <p>12   Ms. Shelke:   Okay.</p> <p>13   Videographer:   Going off the record, the time 14   is 10:29 A.M.</p> <p>15   (A short break was taken at 10:29 A.M.)</p> <p>16   (The proceedings resumed at 10:32 A.M.)</p> <p>17   Videographer:   Going back on the record, the 18   time is 10:32 A.M.</p> <p>19   C R O S S - E X A M I N A T I O N   10:32 A.M.</p> <p>20   By Mr. McKay:</p> <p>21   Q   <b>Mr. Campbell, good morning; we met off the 22   record, but again, I'm John McKay and I represent Peter 23   DelVecchia and his son, --</b></p> <p>24   A   Yes.</p> <p>25   Q   <b>-- who we refer to here as A.D. I just have</b></p>

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<p style="text-align: right;">Page 26</p> <p>1 a couple of questions for you. You did mention that      2 you did not see any first aid applied to Peter, is that      3 correct?</p> <p>4 A That's correct.</p> <p>5 Q Okay, were you particularly paying attention      6 to his condition after the incident?</p> <p>7 A No, I just -- I don't remember like seeing      8 like an ice pack or bandages or, you know, anything,      9 you know. I don't remember like another flight      10 attendant coming with like a first aid kit or anything      11 like that.</p> <p>12 Q All right; all right, sir, so are you trained      13 as an EMT by any chance?</p> <p>14 A I'm not. I'm not. I wasn't implying that he      15 couldn't have not -- couldn't have been injured without      16 me -- you know, without me knowing about it.</p> <p>17 Q All right, do you know what a concussion is?</p> <p>18 A I do.</p> <p>19 Q Okay, well, do you think you would have been      20 able to diagnose a concussion from where you were      21 seated?</p> <p>22 A I don't.</p> <p>23 Q Okay, you also mentioned, I think, that you      24 were surprised by allegations of criminal conduct, is      25 that right?</p>	<p style="text-align: right;">Page 28</p> <p>1 NORTH CAROLINA      2 WAKE COUNTY</p> <p>3 C E R T I F I C A T E</p> <p>4 I, David L. Overby, Notary/Reporter, do      5 hereby certify that Christopher Campbell was duly sworn      6 by Carolyn E. High, Notary/Reporter, prior to the      7 taking of the foregoing deposition; and that this      8 deposition was taken by Carolyn E. High and transcribed      9 under my direction and that the twenty-eight pages      10 which constitute this deposition are a true and      11 accurate transcript of the witness's testimony.</p> <p>12 I certify that I am not counsel for, or      13 employed by either party in this action, nor am I      14 interested in the outcome of this action.</p> <p>15 IN WITNESS THEREOF, I have hereunto set my      16 hand this 30th day of November, 2019.</p> <p>17</p> <p>18       19 David L. Overby      Notary Public      20 Certificate No.: 19930120037</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 27</p> <p>1 A Yes.</p> <p>2 Q Is that because you didn't see anything that      3 would rise to the level of criminal conduct?</p> <p>4 A That and as I mentioned, I did overhear a      5 phone call that didn't sound like, you know -- you      6 know, hey, I've got the kid or, you know, something      7 like that.</p> <p>8 Q Nothing suspicious?</p> <p>9 A No.</p> <p>10 Q Okay, it just seemed very normal to you?</p> <p>11 A Right.</p> <p>12 Q Father and son on a trip?</p> <p>13 A Correct.</p> <p>14 Mr. McKay: Okay, all right, that's all I      15 have; thank you.</p> <p>16 Ms. Shelke: No further questions.</p> <p>17 Videographer: This concludes the video      18 deposition. The time going off the record is 10:33      19 A.M.</p> <p>20 (The proceedings were concluded at 10:35      21 A.M.)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

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